

REMARKS

Reexamination and reconsideration of the application as amended are requested. Support for "directly" attachable in the amended claims is found, for example, from figure 1 and the specification, page 4, lines 27-301. Support for "serves only as a user interface" in the amended claims is found, for example, from the specification, page 4, line 7-13 and lines 25-32. Support for new claims 21 and 22 is found, for example, from claim 1 and the specification, page 4, lines 5-6 and lines 22-32.

The examiner's objection to claims 1-20, because of informalities, is respectfully traversed. The independent claims have been amended as suggested by the examiner.

The examiner's rejection of claims 1-5, 7-14, and 19 as "anticipated", under 35 USC 102(e), is respectfully traversed. The examiner rejects these claims as being unpatentable over Cousins '509. Claims 4-5 and 7-14 depend from claim 1.

Claims 1 and 19 each require the machine 12 to include machine controller electronics 18 which alone, when activated, enable the machine to function as all of at least two different devices. Claims 1 and 19 also each require a first operator panel 14 which, when attached to the machine 12, serves only as a user interface with the machine controller electronics 18 and requires a second operator panel 16 which, when attached to the machine 12 instead of the first operator panel 14 being attached to the machine 12, serves only as a user interface with the machine controller electronics 18.

In rejecting claims 1 and 19, the examiner considers the printer subsystem 24 of the machine 16 of fig. 3 of Cousins to be a first operator panel and the scanning subsystem 26 of the machine 16 of fig. 3 of Cousins to be a second operator panel. Applicants respectfully disagree. Claim 1 now requires the first and second operator panels to each serve only as a user interface with the machine controller electronics. It is clear that the printer subsystem 24 of Cousins in no way serves as a user interface and that the scanning subsystem 26 of Cousins in no way serves as a user interface. The printer subsystem 24 and the scanning subsystem 26 of Cousins together

define the machine controller electronics of the machine 16 of Cousins. Claims 1 and 19 require the machine to include machine controller electronics which alone, when activated, enable the machine to function as all of at least two different devices (such as, for example, a printer and a scanner). The machine of Cousins, with either of his printer subsystem or his scanning subsystem removed, as suggested by the examiner when the examiner defines these subsystems to be removably attachable "operator panels", would not leave the machine of Cousins with machine controller electronics which alone, when activated enable the machine to function as a printer and a scanner.

Claims 8 and 12, which respectively depend indirectly and directly from claim 1, each require the first and second operator panels to each have a display screen.

In rejecting claims 8 and 12, the examiner merely says that the printer and scanning subsystems of Cousins (being considered operator panels by the examiner) can be mounted on the machine and can also have display screens. The examiner is using Cousins as a 102 (anticipation) reference and not as a 103 (obviousness) reference. Such "can be" statements are not appropriate in a 102 rejection. The examiner also states that the keyboard, monitor and mouse of the host computer 22 of Cousins can be considered to be the second operator panel which includes a display screen. However, claims 8 and 12, depending from claim 1, also require, from claim 1, that each operator panel be directly attachable to the machine, whereas the keyboard, etc. of Cousins is indirectly connected to the machine 16 through the computer 22 (see fig. 3 of Cousins). Applicants remarks herein also apply to claims 9 and 13.

Claims 10 and 14 each require each operator panel to have different identification codes recognizable by the machine controller electronics.

In rejecting claims 10 and 14, the examiner states that the machine of Cousins has to be able to differentiate between the "can be" mounting of the printer and the scanner subsystems. Applicants respectfully disagree. The printer and scanner subsystems of Cousins occupy different locations in his machine (see fig. 3). Only when two operator panels can, in the alternative, occupy the same circuit location (e.g., the same operator-panel receptacle – see the

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specification, page 4, lines 28- 31) would one "believe" that such two operator panels need any identification code.

The examiner's rejection of claims 6, 15, 16, 17, 18 and 20 as "obvious", under 35 USC 103(a), is respectfully traversed. The examiner rejects these claims as being unpatentable over Cousins '509 in view of Oyannagi '300, and/or in view of the admitted prior art. Applicant's request that the examiner withdraw Cousins '509 as prior art under 35 USC 103(a) based on the following Statement of Common Ownership made in accordance with 35 USC 103(c)(1).

STATEMENT OF COMMON OWNERSHIP

At the time the claimed invention of US Patent Application No. 10/689,323 was made, US Patent Application Publication No. 2004/0196509 (Cousins '509) and the claimed invention of US Patent Application No. 10/689,323 were owned by or subject to an obligation of assignment to the same entity.

New claim 21 requires the at least two different devices to include the printer and the scanner, wherein the attached first operator panel enables the machine to function as the printer but not the scanner, and wherein the attached second operator panel enables the machine to function as the scanner and the printer. Cousins does not teach, suggest or describe this.

New claim 22 requires the at least two different devices include the printer and the photo card reader, wherein the attached first operator panel enables the machine to function as the printer but not the photo card reader, and wherein the attached second operator panel enables the machine to function as the photo card scanner and the printer. Cousins does not teach, suggest or describe this.

Inasmuch as each of the rejections has been answered by the above remarks, amended claims, and Statement of Common Ownership, it is respectfully requested that the rejections be withdrawn, and that this application be passed to issue.

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